



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

DEC 19 2012

Ms. Felicity Dodson
Regulatory Branch, CESWG-PE-RE
U.S. Army Corps of Engineers
P.O. Box 1229
Galveston, Texas 77553-1229

Dear Ms. Dodson:

The Environmental Protection Agency (EPA) Region 6 has reviewed Public Notice (PN) SWG-2004-02523, dated November 28, 2012. The following comments were prepared under the authority of, and in accordance with, the provisions of the Federal Guidelines (Guidelines) promulgated at 40 CFR Part 230 under Section 404(b)(1) of the Clean Water Act (CWA).

The permit applicants, Sabine Pass LNG, LP, Sabine Pass Liquefaction, LLC, and Cheniere Trail Pipeline, LP, are proposing to modify their existing Liquefied Natural Gas (LNG) terminal to add additional work spaces and structures located in wetlands adjacent to Sabine Pass. The proposed project is located south of State Highway 82 and east of the Sabine Pass bridge in Cameron Parish, Louisiana.

According to the public notice, the applicant would fill 58.04 acres of wetlands in Mitigation Area D. The applicant is proposing to purchase 74.5 credits from the Petit Bois mitigation bank in Cameron Parish, Louisiana and 12.8 credits from the Grand Canard mitigation bank in Jefferson Davis and Calcasieu Parishes, Louisiana.

EPA does not support purchasing credits from the Petit Bois mitigation bank or the Grand Canard mitigation bank because the bank areas and service areas are not located in the Sabine River basin, and Petit Bois is primarily a bottomland hardwood restoration bank. It appears that most of the proposed unavoidable project impacts would occur in non-forested wetlands.

EPA does not understand the number of credits proposed based on iHGM calculations. Is the applicant proposing a multiplier for trading credits outside the watershed? If so, the appropriate multiplier would be at least 2.0.

EPA recommends that the applicant consider marsh mitigation opportunities in the Sabine River basin closer to the impact site.

If you have any questions regarding these comments, please contact Jim Herrington of my staff at 254-770-6595.

Sincerely yours,



Sharon Fancy Parrish
Chief
Wetlands Section

cc: Louisiana Department of Wildlife and Fisheries, Baton Rouge, LA
National Marine Fisheries Service, Baton Rouge, LA
Louisiana Department of Natural Resources, Office of Coastal Management, Baton Rouge, LA
U.S. Fish and Wildlife Service, Lafayette, LA